

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO.: CV 06-3564 FLN**

Wanda Stella,

Plaintiff,

v.

Jeffery Anderson, Pete Kohman, et al,

Defendant.

**NOTICE OF MOTION
AND MOTION FOR
DEFAULT JUDGMENT
OF DEFENDANT**

TO: DEFENDANT ABOVE NAMED:

PLEASE TAKE NOTICE that at a motion to be heard before the Honorable Magistrate Judge Noel of the United States District Court, at 9:00 a.m. on February 20, 2007, in U.S. Court Room 8E, in the U.S. Courthouse, in the City of Minneapolis, State of Minnesota, the undersigned will move the Court for an Order of Default Judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure.

Said motion will be based upon all the files, records and proceedings herein, the arguments of counsel, and upon the followings:

- A. Memorandum in Support of Plaintiff's Motion for Default Judgment;
- B. The Summons and Complaint;
- C. Affidavit of Service for Defendant;
- D. Affidavit of No Answer;
- E. Clerk's Entry of Default; and
- E. Affidavit of Amount Due.

Respectfully submitted,

Dated: January 24, 2007.

BARRY & SLADE, LLC

/s/Nicholas P. Slade

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